

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

Dr. Regina Jordan-Sodiq,
Pro Se Plaintiff,

)
)

vs.

)

Case No. 3: 25-CV-00288

State of Tennessee, et.al., Defendant)
PennyMac Loan Services, LLC,)
Defendant.)

Judge: Judge Eli Richardson

**PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION TO
DISMISS**

I. INTRODUCTION Plaintiff, Dr. Regina Jordan-Sodiq, appearing pro se, respectfully submits this Response in Opposition to Defendant's Motion to Dismiss. Plaintiff asserts that service of process has been executed in compliance with applicable procedural rules, notwithstanding the complexities arising from jurisdictional transitions. Plaintiff further contends that the substantive merits of her claims warrant denial of Defendant's Motion in its entirety.

II. RESPONSE TO SERVICE OF PROCESS ALLEGATIONS Defendant has contested the adequacy of service following the removal of this matter to federal court. Plaintiff responds as follows:

A. Chronology of Service Efforts

1. On March 17, 2025, Plaintiff effectuated service of the summons and complaint upon Defendant's registered agent in Tennessee via USPS with confirmation of receipt.
2. Following removal to the United States District Court for the Middle District of Tennessee, Plaintiff reissued service upon Defendant's registered agent and ensured delivery to Defendant's California office as a precautionary measure.
3. Plaintiff submits proof of service, including tracking receipts, delivery confirmations, and court-stamped copies, which are attached hereto as exhibits.
4. On April 28, 2025, Plaintiff attempted additional service via USPS mail addressed to both Defendant's registered agent, CT Corporation System, and Attorney Norah J. Mason at 300 Montvue Road, Knoxville, TN 37919. These efforts include:
 - o Exhibit A: Returned USPS mail addressed to CT Corporation System.
 - o Exhibit B: USPS Confirmation Receipt No. 9410 8301 0935 5003 0551 68.
 - o Exhibit C: USPS Confirmation Receipt No. 9410 8301 0935 5003 3651 82.
 - o Exhibit D: USPS Confirmation Receipt No. 9410 8301 0935 5003 4147 81.
 - o Exhibit E: USPS Confirmation Receipt No. 9410 8301 0935 5003 4147 98.
 - o Exhibit F: USPS Confirmation Receipt No. 9419 8301 0935 5003 4735 04.
 - o Exhibit G: USPS Confirmation Receipt No. 9410 8301 0935 5003 6271 67.

- Exhibit H: My YouTube page Iustitia's Just Us community wall posts and videos of chronological events of gang-stalking I have experienced and other commentary

B. Good Faith Efforts Any delays or procedural deficiencies in service were the result of confusion following the jurisdictional transfer. Plaintiff acted promptly and in good faith to remedy these issues, demonstrating a commitment to proper notification in accordance with Federal Rule of Civil Procedure 4(m).

C. Request for Equitable Consideration In light of Plaintiff's diligent efforts to resolve service deficiencies, Plaintiff respectfully requests this Honorable Court exercise its discretion to allow this case to proceed on the substantive claims at issue.

III. SUBSTANTIVE CLAIMS Plaintiff's Complaint sets forth well-pleaded causes of action, supported by detailed factual allegations. Specifically:

1. **Intentional Infliction of Emotional Distress:** Defendant engaged in deliberate conduct designed to inflict severe emotional harm upon Plaintiff.
2. **Negligent Infliction of Emotional Distress:** Defendant's actions, executed without reasonable care, foreseeably resulted in emotional harm to Plaintiff.
3. **Civil Conspiracy:** Defendant participated in an agreement or concerted action with others to perpetuate harassment, abuse, and financial exploitation against Plaintiff.

IV. CERTIFICATE OF SERVICE I hereby certify that, on April 29, 2025, a true and accurate copy of this Response was served upon Defendant PennyMac Loan Services, LLC, and Defendant's registered agent, CT Corporation System via the Electronic Case Filing (ECF) system.

V. REQUEST FOR RELIEF For the foregoing reasons, Plaintiff respectfully requests that this Honorable Court deny Defendant's Motion to Dismiss in its entirety. Plaintiff has adequately addressed all procedural concerns pertaining to service of process and seeks the opportunity to advance her claims on their merits. In the alternative, Plaintiff requests leave to amend the Complaint to cure any deficiencies identified by the Court.

Respectfully submitted,

Dr. Regina Jordan-Sodiq, Pro Se Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

DR. Regina Jordan-Podig
Plaintiff(s),

Case Number 3:25-CV-00288

v.

Judge Judge Eli Richardson

The State of Tennessee et al.
Defendant(s).

Magistrate Judge _____

and Penny Mae Defendant

Response to the Motion to Dismiss
(Type of Pleading)

- ① Exhibit A - letter to CT Corporation System
Registered Agent and Attorney Noah S Mason
- ② Exhibit B - USPS confirmation Receipt
9410 8301 0935 5003 0551 68
- ③ Exhibit C - USPS confirmation Receipt
9410 8301 0935 5003 3651 82
- ④ Exhibit D - USPS confirmation Receipt
9410 8301 0935 5003 4147 81
- ⑤ Exhibit E - USPS confirmation Receipt
9410 8301 0935 5003 4147 98
- ⑥ Exhibit F - USPS confirmation Receipt
9410 8301 0935 5003 4735 04
- ⑦ Exhibit G - USPS Confirmation Receipt
9410 830 0935 5003 6271 67
- ⑧ Exhibit H - Justitia's Just-US YouTube page
- ⑨ Sabrina Brewer email reflecting submission NOT PDF scan
Exhibit I.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading)
has been served on:

Response to Defendant
Motion to Dismiss

(Name)
(Address)
(Address)

Kimberly S. Seirs
214 Church Street
Suite 3200, Nashville TN 37203

(Name)
(Address)
(Address)

Katherine R. Rogers
222 Second Ave South, Suite 2000
Nashville TN 37203

(Name)
(Address)
(Address)

Stanley W. Mitchell
309 2nd St
Clarksville TN 37040

(Name)
(Address)
(Address)

Jason W. Dillon
C & L Gates LLP
501 Commerce Street
Suite 1500, Nashville TN 37203

(Name)
(Address)
(Address)

Tracey R. Knight
308 2nd Street
Clarksville TN 37040

(Name)
(Address)
(Address)

Christopher Murphy
Rudor Sam BLP Flathead Building
1320 Adams St, Suite 1400

(Name)
(Address)
(Address)

Nashville TN 37203
600 Peachtree Street, NE, Suite 3000
Atlanta GA 30308

(Name)
(Address)
(Address)

John H. Dellerhide
Daries Snow LLC
15th 2nd Avenue South Suite 1600
Nashville TN 37203

(Name)
(Address)
(Address)

Cole William Schott
3112 West End Ave Suite 1100
Nashville TN 37203

on the day of

24
Signature

Continue -

2

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading)
has been served on:

(Name)

(Address)

(Address)

IN. Scott & Sims

3102 West End Avenue, Suite 1100

Nashville TN 37203

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

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(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

on the 29th day of

April

25

DR

Courtroom

3

DR 
(Signature)

DR REGINA JORDAN-SODIG
(Print Name)

1757 Autumnwood Blvd
Clarksville TN

(931) 561-2546; 37042
(Address & Telephone Number, if any)

(4)

Instructions

1. Please use a laser or laser-quality printer.
2. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secure. Self-adhesive label is recommended.
3. Place label so that it does not wrap around the edge of the package.
4. Each shipping label number is unique and can be used only once - DO NOT PHOTOCOPY.
5. Please use this shipping label on the "ship date" selected when you requested the label.
6. If a mailing receipt is required, present the article and Online e-Label Record at a Post Office for postmark.

9410 8301 0935 5003 0551 68

Print Date: 2025-03-17

Ship Date: 2025-03-17

PRIORITY MAIL®	\$8.75
Extra Services:	\$3.70
Fees:	<u>\$0.00</u>
Total:	\$12.45

From: REGINA JORDAN-SODIQ
1757 AUTUMNWOOD BLVD
CLARKSVILLE TN 37042-1713

To: CT CORPORATION SYSTEM
PENNYMAC LOAN SERVICES LLC
300 MONTVUE RD
KNOXVILLE TN 37919-5510

* Commercial Pricing PRIORITY MAIL® rates apply. There is no fee for USPS Tracking® service on PRIORITY MAIL® service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.



Thank you for shipping with the United States Postal Service!
Check the status of your shipment on the USPS Tracking® page at usps.com

exhibit D

Handwritten signature and scribbles.

Cut on dotted line.

Instructions

1. Please use a laser or laser-quality printer.
2. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secure. Self-adhesive label is recommended.
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9410 8301 0935 5003 3651 82

Print Date: 2025-04-02

Ship Date: 2025-04-02

PRIORITY MAIL®	\$8.75
Extra Services:	\$3.70
Fees:	<u>\$0.00</u>
Total:	\$12.45

From: REGINA JORDAN-SODIQ
1757 AUTUMNWOOD BLVD
CLARKSVILLE TN 37042-1713

To: CT CORPORATION SYSTEM (REGISTERED AGENT)
PENNYMAC LOAN SERVICES
300 MONTVUE RD
KNOXVILLE TN 37919-5510

* Commercial Pricing PRIORITY MAIL® rates apply. There is no fee for USPS Tracking® service on PRIORITY MAIL® service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.



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Exhibit D

Cut on dotted line.

Instructions

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- 6. If a mailing receipt is required, present the article and Online e-Label Record at a Post Office for postmark.

9410 8301 0935 5003 4147 81

Print Date: 2025-04-04	PRIORITY MAIL®	\$8.75
Ship Date: 2025-04-04	Extra Services:	\$3.70
	Fees:	\$0.00
	Total:	\$12.45

From:

REGINA JORDAN-SODIQ
1757 AUTUMNWOOD BLVD
CLARKSVILLE TN 37042-1713

To:

PENNYMAC MORTGAGE LLC
CT CORPORATION SYSTEM (REGISTERED AGEN
300 MONTVUE RD
KNOXVILLE TN 37919-5510

* Commercial Pricing PRIORITY MAIL® rates apply. There is no fee for USPS Tracking® service on PRIORITY MAIL® service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.


 **UNITED STATES POSTAL SERVICE.** Thank you for shipping with the United States Postal Service!
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Exhibit E

Cut on dotted line.

Instructions

1. Please use a laser or laser-quality printer.
2. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secure. Self-adhesive label is recommended.
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6. If a mailing receipt is required, present the article and Online e-Label Record at a Post Office for postmark.

9410 8301 0935 5003 4147 98

Print Date: 2025-04-04

Ship Date: 2025-04-04

PRIORITY MAIL®	\$8.75
Extra Services:	\$3.70
Fees:	<u>\$0.00</u>
Total:	\$12.45

From: REGINA JORDAN-SODIQ
1757 AUTUMNWOOD BLVD
CLARKSVILLE TN 37042-1713

To: TROUTMAN PEPPER HAMILTON SANDERS LLP
NOAH J MASON, ESQ
STE 3000
600 PEACHTREE ST NE
ATLANTA GA 30308-2305

* Commercial Pricing PRIORITY MAIL® rates apply. There is no fee for USPS Tracking® service on PRIORITY MAIL® service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.



Thank you for shipping with the United States Postal Service!
Check the status of your shipment on the USPS Tracking® page at usps.com

Instructions

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9410 8301 0935 5003 4735 04

Print Date: 2025-04-08

Ship Date: 2025-04-08

PRIORITY MAIL®

Extra Services:

Fees:

Total:

\$8.75

\$3.70

\$0.00

\$12.45

From: REGINA JORDAN-SODIQ
1757 AUTUMNWOOD BLVD
CLARKSVILLE TN 37042-1713

To: PENNYMAC MORTGAGE LLC
CT CORPORATION SYSTEM
300 MONTVUE RD
KNOXVILLE TN 37919-5510

* Commercial Pricing PRIORITY MAIL® rates apply. There is no fee for USPS Tracking® service on PRIORITY MAIL® service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.

UNITED STATES
POSTAL SERVICE®

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Check the status of your shipment on the USPS Tracking® page at usps.com

Exhibit F

CERTIFICATION (IF APPLICABLE)

I, Wendy Davis, Circuit Court Clerk of Montgomery County, Tennessee, do certify this to be a true and correct copy of the original summons in this case.

Date: _____

Wendy Davis, Clerk / Deputy Clerk

SERVICE RETURN: Please execute this summons and make your return within ninety days of issuance as provided by law.

I certify that I have served this summons and complaint as follows: _____

I certify that I was unable to serve the summons and complaint because: _____

Date: _____

By: _____

Officer, Title/Process Server

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on 3-17-25, I sent prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the styled case, to the defendant CT Corporation System on 3-19-25. I received the return receipt, which had been signed as per PennyMac Loan Service. The return receipt is attached to this original summons to be filed by the Court Clerk. LLC Memorandum dtd 3/28/25

[Signature]
Plaintiff's Attorney (or Person Authorized to Serve Process)

SWORN TO AND SUBSCRIBED BEFORE ME
THIS _____ DAY OF _____, 20____.

Notary Public / Deputy Clerk (Comm. Expires _____)

(Attach return receipt on back)



ADA – If you have a disability and require assistance, please contact 931-553-5113

245-3370

RECEIVED

MAR 17

Rev. 2/21

Instructions

1. Please use a laser or laser-quality printer.
2. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secure. Self-adhesive label is recommended.
3. Place label so that it does not wrap around the edge of the package.
4. Each shipping label number is unique and can be used only once - DO NOT PHOTOCOPY.
5. Please use this shipping label on the "ship date" selected when you requested the label.
6. If a mailing receipt is required, present the article and Online e-Label Record at a Post Office for postmark.

9410 8301 0935 5003 6271 67

Print Date: 2025-04-15

Ship Date: 2025-04-15

PRIORITY MAIL®

\$8.75

Extra Services:

\$3.70

Fees:

\$0.00

Total:

\$12.45

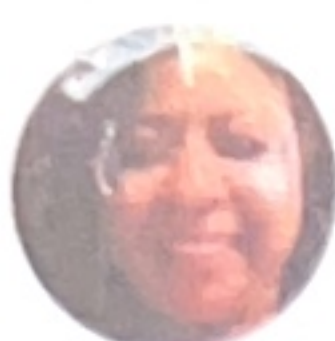
From: REGINA JORDAN-SODIQ
1757 AUTUMNWOOD BLVD
CLARKSVILLE TN 37042-1713

To: C/O CT CORPORATION SYS (REGISTERED AGENT)
NOAH J MASON
300 MONTVUE RD
KNOXVILLE TN 37919-5510

* Commercial Pricing PRIORITY MAIL® rates apply. There is no fee for USPS Tracking® service on PRIORITY MAIL® service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.



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lustitia's Just Us

@iustitiaJustUs 2.25K subscribers · 175 videos

lustitia's Just Us channel · define "I, Just-Justice (Lustitia) is an allegorical personification of justice."

gustitiaboutique.com and 5 more links

Customize channel Manage videos

Home Videos Shorts Live Playlists Posts

lustitia's Just Us

Visibility: Public

What do you want to share with members today?

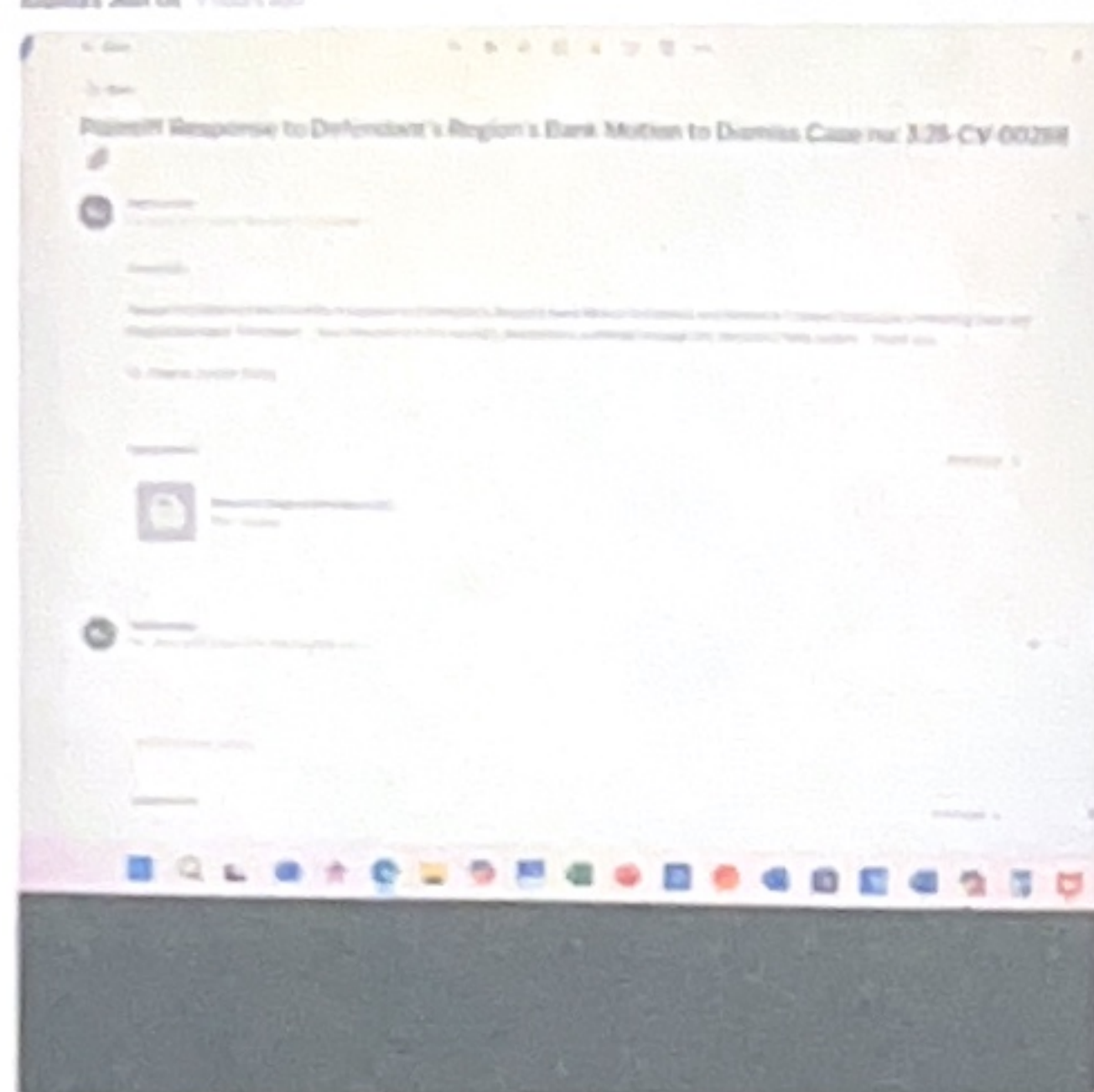
Image Image poll Text poll Quiz Video

Post

PUBLISHED SCHEDULED ARCHIVED



lustitia's Just Us · 1 hour ago



Like Comment Retweet Share

Settings



Exhibit H

FW: Pro Se E-filing Submissions
From: Caylor Haynes (caylor_haynes@tnmd.uscourts.gov)
To: g4818@yahoo.com
Cc: sabrina_brewer@tnmd.uscourts.gov
Date: Monday, May 5, 2025 at 12:26 PM CDT

Exhibit I

Message Body

Good morning,

We have received your e-filing submissions. The submissions will be rejected for the following reasons:

- Documents were not submitted as PDFs
 - Photographs are not accepted

Although, the images themselves have been submitted as PDFs, they are images imbedded in PDF files.

For assistance with e-filing rules and procedures, please visit our website:

<https://www.tnmd.uscourts.gov/pro-se-electronic-filing-portal>

Thank you,

Ms. Caylor Haynes
Civil Case Administrator
United States District Court
Middle District of Tennessee
719 Church Street, Suite 1300
Nashville, TN 37203
(615) 736-5498

From: Sabrina Brewer <Sabrina_Brewer@tnmd.uscourts.gov>
Sent: Tuesday, April 29, 2025 4:38 PM
To: G4818@yahoo.com
Cc: Caylor Haynes <Caylor_Haynes@tnmd.uscourts.gov>
Subject: Pro Se E-filing Submissions

Good evening,

We have received your e-filing submissions, and are rejecting them for the following reasons:

- Documents were not submitted as PDFs
 - Photographs are not accepted

For assistance with e-filing rules and procedures, please visit our website: <https://www.tnmd.uscourts.gov/pro-se-electronic-filing-portal>

Thank you,

Sabrina Brewer
Civil Case Administrator

United States District Court

Middle District of Tennessee

719 Church Street, Suite 1300

Nashville, TN 37203

(615) 736-5498

Exhibit I